

1 Kevin L. Hernandez, Esq.
2 Nevada Bar No. 12594
LAW OFFICE OF KEVIN L.
HERNANDEZ
3 8872 S. Eastern Avenue, Suite 270
Las Vegas, Nevada 89123
4 T: (702) 563-4450
F: (702) 552-0408
5 kevin@kevinhernandezlaw.com
6 *Attorney for Plaintiff*

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 DEBORAH A. CARROLL, an individual;

Case No.: 2:20-cv-01728-KJD-EJY

10 Plaintiff,

11 v.

12 MEDICREDIT, INC., a foreign corporation;

13 Defendant.

14 **STIPULATION AND ORDER
EXTENDING TIME FOR PLAINTIFF
TO FILE A RESPONSE TO
DEFENDANT'S MOTION TO DISMISS
OR STAY PLAINTIFF'S COMPLAINT**

15 **[First Request]**

16 Plaintiff, Deborah A. Carroll (“Plaintiff”), and Defendant, Medicredit, Inc., (“Medicredit”)
17 have agreed to extend the time for Plaintiff to file a Response to Medicredit’s Motion to Dismiss
18 or Stay Plaintiff’s Complaint [ECF No. 5] (“Motion to Dismiss”) to **November 10, 2020**.
19 Medicredit filed its Motion to Dismiss on October 13, 2020 and the current response deadline is
20 October 27, 2020.

21 The parties request this brief extension to permit them to discuss possible resolution of this
22 matter. The extension will allow the parties to further explore settlement options without
23 expending unnecessary attorneys’ fees and costs.

24 ///

25 ///

26 ///

27 ///

28 ///

1 This is the first request for an extension to respond to Medicredit's Motion to Dismiss and
2 this request is made in good faith and not for the purpose of delay.

3 Dated: October 20, 2020

 Dated: October 20, 2020

4 **LAW OFFICE OF**
5 **KEVIN L. HERNANDEZ**

6 */s/ Kevin L. Hernandez*
7 Kevin L. Hernandez, Esq.
8 Nevada Bar No. 12594
9 8872 S. Eastern Avenue, Suite 270
10 Las Vegas, Nevada 89123
11 kevin@kevinhernandezlaw.com
12 Attorney for Plaintiff

SPENCER FANE LLP

13 */s/ Mary E. Bacon*
14 Mary E. Bacon, Esq.
15 Nevada Bar No. 12686
16 300 South 4th Street, Suite 950
17 Las Vegas, Nevada 89101
18 mbacon@spencerfane.com
19 Attorney for Defendant Medicredit, Inc.

20 **IT IS SO ORDERED:**

21 
22 UNITED STATES DISTRICT JUDGE

23 DATED: 11/10/2020

24 Law Office of Kevin L. Hernandez
25 8872 S. Eastern Avenue Suite 270
26 Las Vegas, Nevada 89123
27 (702) 563-4450 FAX: (702) 552-0408